

PAUL J. ZOERB and
ETTA MAYE ZOERB, His Wife

Vs.

SILAS P. RICE

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NO. 25,501 EQUITY

IN THE CIRCUIT COURT FOR
FREDERICK COUNTY, MARYLAND

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ANSWER TO BILL OF COMPLAINT TO QUIET TITLE TO
ESTABLISH BOUNDARY LINES AND FURTHER RELIEF

Now comes the Respondent, Silas P. Rice, by Nikirk and Nikirk, his Solicitors, and for Answer to the Bill of Complaint to Quiet Title to Establish Boundary Lines and Further Relief, respectfully represents unto your Honorable Court:

FIRST: That he admits the allegations contained in the FIRST paragraph of said Bill of Complaint.

SECOND: Answering the SECOND paragraph of said Bill of Complaint, your Respondent admits that the property of the Complainant was surveyed by Joseph F. Brown, Surveyor, on July 29, 1972, but avers that the metes and bounds description of the Complainant's land prepared by the said Joseph F. Brown is incorrect.

THIRD: Answering the THIRD paragraph of said Bill of Complaint, your Respondent states that he has no knowledge of the negotiations between the Complainant and the previous owner, Mr. William Harvey Lewis, and consequently can neither admit nor deny those matters. Further answering the THIRD paragraph of said Bill of Complaint, your Respondent states that to his knowledge there was never any elm tree marked as a boundary line.

FOURTH: Answering the FOURTH paragraph of said Bill of Complaint, your Respondent admits that the Complainant and the Respondent have both zealously claimed and asserted their rights to the property in question; and further answering the FOURTH paragraph of said Bill of Complaint your Respondent denies that he has ever pulled up or destroyed any markers or stakes, but